

EXHIBIT 311

Highly Confidential - Subject to Further Confidentiality Review

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
11)

12
13
14
15
16
17
18
19
20
21
22
23
24
25
Wednesday, January 23, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped Deposition of SUSANNE
HILAND, held at 4206 South J.B. Hunt Drive,
Rogers, Arkansas, commencing at 8:25 a.m., on
the above date, before Debra A. Dibble,
Certified Court Reporter, Registered
Diplomate Reporter, Certified Realtime
Captioner, Certified Realtime Reporter and
Notary Public.

GOLKOW LITIGATION SERVICES
877.370.3377 ph | fax 917.591.5672
deps@golkow.com

Highly Confidential - Subject to Further Confidentiality Review

1 A P P E A R A N C E S:
2 CARELLA, BYRNE, CECCHI, OLSTEIN,
 BRODY & AGNELLO, P.C.
3 BY: ZACHARY BOWER, ESQUIRE
 zbower@carellabyrne.com
4 MICHAEL INNES, ESQUIRE
 minnes@carellabryne.com
5 5 Becker Farm Road
 Roseland, New Jersey 07068-1739
6 (973) 994-1700
 Counsel for Plaintiffs
7
8 JONES DAY
9 BY: TINA TABACCHI, ESQUIRE
 ttabacchi@jonesday.com
10 SCOTT ELMER, ESQUIRE
 selmer@jonesday.com
11 JASON ZHOU, ESQUIRE
 jzhou@jonesday.com
 (Attending telephonically)
12 77 West Wacker
 Chicago, Illinois 60601-1692
13 312-782-1692
 Counsel for Walmart
14
15 WRIGHT, LINDSEY & JENNINGS, LLP
16 BY: CALEY B. VO, ESQUIRE
 cvo@wlj.com
 3333 Pinnacle Hills Parkway
17 Suite 510
 Rogers, Arkansas 72758-8498
18 (479) 986-0888
 Counsel for McKesson
19
20 REED SMITH, LLP
 (appearing telephonically)
21 BY: MARY BALASTER, ESQUIRE
 mbalaster@reedsmith.com
22 811 Main Street
 Suite 1700
23 Houston, Texas 77002-6110
 (713) 469-3800
24 Counsel for AmerisourceBergen
25

Highly Confidential - Subject to Further Confidentiality Review

1 ARNOLD & PORTER KAYE SCHOLER, LLP
 (appearing telephonically)
2 BY: KAREN RIGBERG, ESQUIRE
 Karen.Rigberg@arnoldporter.com
3 777 South Figueroa Street
 44th Floor
4 Los Angeles, California 90017-5844
 (213) 243-4000
5 Counsel for Endo Health Solutions
 Inc.; Endo Pharmaceuticals Inc.; Par
6 Pharmaceuticals, Inc.; Par
 Pharmaceutical Companies, Inc.
7 formerly known as Par Pharmaceutical
 Holdings, Inc.

8
9 BARBER LAW FIRM
 BY: J. CARTER FAIRLEY, ESQUIRE
10 cfairley@barberlawfirm.com
 425 West Capitol Avenue
11 Suite 3400
 Little Rock, Arkansas 72201
12 (501) 707-6182
 Counsel for Cardinal Health, Inc.

13
14 ALSO PRESENT:

15
 Jennifer B. Bechet
16 Senior Associate Counsel
 Walmart, Inc.

17
18 THE VIDEOGRAPHER:
19 Chris Ritona
 Golkow Litigation Services

20 — — —
21
22
23
24
25

Highly Confidential - Subject to Further Confidentiality Review

1 [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]
4 October 24th, 2017. Remind me when Walmart
5 decided to exit the distribution --
6 self-distribution of Schedule II narcotics.

7 MS. TABACCHI: Object to the
8 form. Lack of foundation.

9 THE WITNESS: I don't know when
10 the decision was made. We exited in
11 April 2018 for C-IIs.

12 Q. (BY MR. INNES) Okay. Was that
13 all C-IIs?

14 A. Yes.

15 [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] -- [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED] -- [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] -- [REDACTED]
22 [REDACTED]
23 [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED]